

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN
Park 80 West-Plaza One
250 Pehle Ave., Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
ROBERT M. ROTHMAN
ERIN W. BOARDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Lead Counsel for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

RICKY DUDLEY, Individually and On Behalf of All Others Similarly Situated,) No. 2:11-cv-05196-WJM-MF

Plaintiff,)

vs.)

CHRISTIAN W. E. HAUB, et al.,)

Defendants.)

CLASS ACTION

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING TIME TO RESPOND TO
INTERROGATORIES

WHEREAS, on September 13, 2013, this Court entered a Pretrial Scheduling Order, which provided, among other things, that the parties may serve interrogatories limited to twenty-five (25) single questions on or before September 30, 2013, to be responded to no later than October 30, 2013;

WHEREAS, Defendants served their First Set of Interrogatories to Lead Plaintiffs on September 16, 2013 and served their Second Set of Interrogatories to Lead Plaintiffs on September 30, 2013;

WHEREAS, the parties have scheduled a mediation session for November 21, 2013 with David Geronemus, Esq. of JAMS;

WHEREAS, in order to conserve the parties' resources and enable the parties to focus their efforts on preparing for the mediation, Lead Plaintiffs seek a brief extension of time to respond to Defendants' interrogatories;

WHEREAS, Defendants do not oppose this request; and

WHEREAS, this is the first request for an extension of time to serve responses to interrogatories;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, as follows:

1. Lead Plaintiffs shall respond to Defendants' interrogatories on or before December 5, 2013.

DATED: October 28, 2013

Respectfully submitted,

s/ Allen W. Burton
ALLEN W. BURTON

s/ Michael S. Gordon
MICHAEL S. GORDON

Bradley J. Butwin (*pro hac vice*)
William J. Sushon (*pro hac vice*)
Allen W. Burton
O'MELVENY & MYERS LLP
7 Times Square
New York, NY 10036
Telephone: 212/326-2000

Counsel for Brenda M. Galgano

s/ Sheila A. Sadighi
SHEILA A. SADIGHI

Lawrence M. Rolnick
Sheila A. Sadighi
LOWENSTEIN SANDLER LLP
65 Livingston Avenue
Roseland, NJ 07068
Telephone: 973/597-2468

-and-

Gary A. Bornstein (*pro hac vice*)
CRAVATH SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019-7475
Telephone: 212/474-1104

Counsel for Christian W.E. Haub

s/ Peter S. Pearlman
PETER S. PEARLMAN

Peter S. Pearlman
COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
Park 80 West-Plaza One
250 Pehle Ave., Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel for Plaintiffs

Michael S. Gordon
Alan R. Friedman (*pro hac vice*)
KATTEN MUCHIN ROSEN MAN LLP
575 Madison Avenue
New York, NY 10022-2585
Telephone: 212/940-8800

Counsel for Eric Claus

s/ Mark A. Berman
MARK A. BERMAN

Mark A. Berman
HARTMANN DOHERTY ROSA BERMAN
& BULBULIA LLC
65 Route 4 East
River Edge, NJ 07661
Telephone: 201/441-9056

-and-

Richard A. Rosen (*pro hac vice*)
James L. Brochin
PAUL WEISS RIFKIND WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
Telephone: 212/373-3000

Counsel for Frederic Brace

Samuel H. Rudman
Robert M. Rothman (*pro hac vice*)
Erin W. Boardman
ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Lead Counsel for Plaintiffs

SO ORDERED.

DATED: November 4, 2013

A handwritten signature in black ink, appearing to read "Mark Falk", is written over a rectangular stamp area.

THE HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE